CAUSE NO. PD-1124-20

	§	FILED
JACE MARTIN LAWS	§	IN THE COURTOF GRIMINAL APPEALS 4/20/2021
	S	DEANA WILLIAMSON, CLERK
VS	S	CRIMINAL APPEALS
	S	
THE STATE OF TEXAS	§	STATE OF TEXAS

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE BRIEF

TO THE HONORABLE SIXTH COURT OF APPEALS:

Pursuant to TEX. R. APP. P. 10.5 and 38.6(d), the Appellant, Jace Martin Laws, files this Unopposed Motion to Extend Time to File Appellant's Brief.

Appellant's Brief is currently due on April 19, 2021. Counsel for Appellant requests a **60-day** extension of time to file its brief, making the brief due on June 18, 2021.

Counsel for Appellant relies on the following reasons, in addition to the routine matters that counsel must attend to in daily practice, to explain the need for the requested extension:

On April 9, 2021, counsel for Appellant was substituted for previous counsel to represent Appellant due to previous counsel being ill. Counsel for Appellant has not had sufficient time to apprise himself of the issues in this case, or review the record.

Counsel for Appellant seeks this 60-day extension of time due to the fact that counsel is not in possession of the

complete record. Counsel seeks the 60-day extension to be able to prepare a cogent and succinct brief to aid this Court in its analysis of the issues presented. This request is not sought for delay but so that justice may be done.

The undersigned has conferred with opposing counsel, and opposing counsel has indicated it does not oppose this motion.

All facts recited in this motion are within the personal knowledge of the counsel signing this motion, therefore no verification is necessary under Rule of Appellate Procedure 10.2.

PRAYER FOR RELIEF

For the reasons set forth above, Appellant requests that this Court grant this Unopposed Motion to Extend Time to File Appellant's Brief and extend the Deadline for Filing the Appellant's Brief up to and including June 18, 2021. Appellant requests all other relief to which it may be entitled.

Respectfully submitted,

/s/ Jeff T. Jackson

Jeff T. Jackson

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CERTIFICATE OF SERVICE

Pursuant to Tex. R. App. P. 9.5, I certify that on April 19, 2021, a copy of this motion was e-served on counsel for Appellee.

/s/ Jeff T. Jackson .
Jeff T. Jackson

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

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